<u>**Remarks**</u>

Reconsideration of the present application is respectfully requested in view of the foregoing amendments and following remarks. Claims 1-13 are pending in the application. No claims have been allowed. Claims 1-13 have been rejected. These rejections are respectfully traversed.

Patentability of Claims 1 and 3-13 over Nierlich in view of Karanam under 35 U.S.C. § 103

Claims 1 and 3-13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,519,509 to Nierlich et al. ("Nierlich") in view of U.S. Patent No. 6,266,713 to Karanam et al. ("Karanam"). These rejections are respectfully traversed.

<u>Claim 1</u>

Independent claim 1 requires "a <u>user configuration file</u> accessible by the remote user system for affecting the plurality of power-control outlets; a memory disposed in the power-distribution apparatus and having a <u>user configuration file storage area</u>; and a <u>user configuration file transfer mechanism</u> in communication with the communication interface accessible by the remote user system, whereby the user configuration file transfer mechanism <u>imports and exports the user configuration file</u> from the power-distribution apparatus to the remote user system via the communication interface" (emphasis added).

Nierlich does not teach or suggest a user configuration file, much less storage of the user configuration file or importing/exporting the user configuration file, as required by independent claim 1. For example, Nierlich is understood to describe a set of instructions received from a management device that can include defining callback intervals, actuating alarms, and controlling voltage channels (see col. 6, line 60, to col. 7, line 15, as noted in the Office Action). Nierlich does not, however, describe anything relating to a user configuration file, much less a user configuration file accessible by a remote user system for affecting a plurality of power-control ports, storage of the user configuration file, or importing and exporting the user configuration file, all of which are required by independent claim 1.

Karanam does not cure the deficiencies of Nierlich. For example, FIG. 3 of Karanam and the corresponding discussion at col. 5, lines 1-39 (as noted in the Office Action), is understood to describe a system that includes a DDE server 100, logical data tables 102, and a variety of

connected modules 104, 106, 108, 110, and 112. Karanam is understood to go on to describe, at col. 8, lines 11-23 (as noted in the Office Action), an off-line server configuration utility that: provides for communication port, device/topic, and device type register map, group polling priority, and supported function codes configuration, as well as device type register map invalid register addresses, item mnemonic to register mapping, and server operational parameters; and also allows for the exporting and importing of register groups and mnemonics. Karanam is also understood to describe, at col. 17, lines 33-49 (as noted in the Office Action), a feature that allows a user to configure the system as well as export and import register groups and mnemonics. Karanam does not, however, describe anything relating to a user configuration file accessible by a remote user system for affecting a plurality of power-control ports, much less storage of the user configuration file or importing and exporting the user configuration file, all of which are required by independent claim 1.

Furthermore, Applicants respectfully submit that there is no suggestion or motivation to combine the references.

Therefore, Nierlich and Karanam, individually or in combination, do not teach or suggest the requirements of independent claim 1. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection be withdrawn from independent claim 1.

Claims 3-9

Dependent claims 3-9 depend directly or indirectly from parent claim 1, and are allowable for at least the reasons recited above in support of parent claim 1. They are also independently patentable. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of dependent claims 3-9 be withdrawn.

Claim 10

Independent claim 10 requires "uploading a copy of the user configuration file to the remote control application from the power-distribution apparatus over a data communication channel; and downloading a substitute user configuration file from the remote control application to the power-distribution apparatus over the data communication channel, wherein the substitute user configuration file may replace the user configuration file" (emphasis added).

Nierlich does not teach or suggest a user configuration file, much less uploading/downloading a copy of the user configuration file, as required by independent claim 10. For example, Nierlich is understood to describe a set of instructions received from a management device that can include defining callback intervals, actuating alarms, and controlling voltage channels (see col. 6, line 60, to col. 7, line 15, as noted in the Office Action). Nierlich does not, however, describe anything relating to a user configuration file, much less uploading a copy of the user configuration file or downloading a substitute user configuration file, all of which are required by independent claim 10.

Karanam does not cure the deficiencies of Nierlich. For example, FIG. 3 of Karanam and the corresponding discussion at col. 5, lines 1-41 (as noted in the Office Action), is understood to describe a system that includes a DDE server 100, logical data tables 102, and a variety of connected modules 104, 106, 108, 110, and 112. Karanam is understood to go on to describe, at col. 8, lines 11-23 (as noted in the Office Action), an off-line server configuration utility that: provides for communication port, device/topic, and device type register map, group polling priority, and supported function codes configuration, as well as device type register map invalid register addresses, item mnemonic to register mapping, and server operational parameters; and also allows for the exporting and importing of register groups and mnemonics. Karanam is also understood to describe, at col. 17, lines 33-49 (as noted in the Office Action), a feature that allows a user to configure the system as well as export and import register groups and mnemonics. Karanam does not, however, describe anything relating to a user configuration file that may affect the plurality of power-control ports, uploading a copy of the user configuration file, or downloading a substitute user configuration file, all of which are required by independent claim 10.

Furthermore, Applicants respectfully submit that there is no suggestion or motivation to combine the references.

Therefore, Nierlich and Karanam, individually or in combination, do not teach or suggest the requirements of independent claim 10. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection be withdrawn from independent claim 10.

Claims 11 and 12

Dependent claims 11 and 12 depend directly or indirectly from parent claim 10, and are allowable for at least the reasons recited above in support of parent claim 10. They are also independently patentable. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of dependent claims 11 and 12 be withdrawn.

Claim 13

Independent claim 13 requires "a user configuration file transfer application providing for selectably importing a user configuration file from the distal power manager application through the data communications port system to the power manager memory, or exporting the user configuration file from the power manager memory through the data communications network port system to the distal power manager application over the data communications network" (emphasis added).

Nierlich does not teach or suggest a user configuration file, much less selectably importing a user configuration file or exporting the user configuration file, as required by independent claim 13. For example, Nierlich is understood to describe a set of instructions received from a management device that can include defining callback intervals, actuating alarms, and controlling voltage channels (see col. 6, line 60, to col. 7, line 15, as noted in the Office Action). Nierlich does not, however, describe anything relating to a user configuration file, much less selectably importing a user configuration file or exporting the user configuration file, both of which are required by independent claim 13.

Karanam does not cure the deficiencies of Nierlich. For example, FIG. 3 of Karanam and the corresponding discussion at col. 5, lines 1-41 (as noted in the Office Action), is understood to describe a system that includes a DDE server 100, logical data tables 102, and a variety of connected modules 104, 106, 108, 110, and 112. Karanam is understood to go on to describe, at col. 8, lines 11-23 (as noted in the Office Action), an off-line server configuration utility that: provides for communication port, device/topic, and device type register map, group polling

priority, and supported function codes configuration, as well as device type register map invalid register addresses, item mnemonic to register mapping, and server operational parameters; and also allows for the exporting and importing of register groups and mnemonics. Karanam is also understood to describe, at col. 17, lines 33-49 (as noted in the Office Action), a feature that allows a user to configure the system as well as export and import register groups and mnemonics. Karanam does not, however, describe anything relating to a user configuration file, much less selectably importing a user configuration file or exporting the user configuration file, both of which are required by independent claim 13.

Furthermore, Applicants respectfully submit that there is no suggestion or motivation to combine the references.

Therefore, Nierlich and Karanam, individually or in combination, do not teach or suggest the requirements of independent claim 13. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection be withdrawn from independent claim 13.

Patentability of Claim 2 over Nierlich and Karanam, in further view of Potega, under 35 U.S.C. § 103

Claim 2 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,519,509 to Nierlich et al. ("Nierlich") and U.S. Patent No. 6,266,713 to Karanam et al. ("Karanam"), in further view of U.S. Patent No. 6,459,175 to Potega ("Potega"). This rejection is respectfully traversed.

Dependent claim 2 depends directly or indirectly from its parent claim 1, and is allowable for at least the reasons recited above in support of its parent claim 1. It is also independently patentable. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of dependent claim 2 be withdrawn.

Patentability of Claims 1 and 13 over Potega in view of Nierlich, further in view of Karanam, under 35 U.S.C. § 103

Claims 1 and 13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,459,175 to Potega ("Potega") in view of U.S. Patent No. 6,519,509 to Nierlich

et al. ("Nierlich"), further in view of U.S. Patent No. 6,266,713 to Karanam et al. ("Karanam").
These rejections are respectfully traversed.

Claim 1

Independent claim 1 requires "a <u>user configuration file</u> accessible by the remote user
system for affecting the plurality of power-control outlets; a memory disposed in the power-
distribution apparatus and having a <u>user configuration file storage area</u>; and a <u>user configuration</u>
<u>file transfer mechanism</u> in communication with the communication interface accessible by the
remote user system, whereby the user configuration file transfer mechanism <u>imports and exports</u>
<u>the user configuration file</u> from the power-distribution apparatus to the remote user system via
the communication interface" (emphasis added).

Potega does not teach or suggest a user configuration file, much less storage of the user
configuration file or importing/exporting the user configuration file, as required by independent
claim 1. For example, Potega is understood to describe a remote Master Control Unit (MCU)
that sends commands to controllable power supplies (see col. 30, line 63, to col. 31, line 8, as
noted in the Office Action). Potega does not, however, describe anything relating to a user
configuration file, much less a user configuration file accessible by a remote user system for
affecting a plurality of power-control ports, storage of the user configuration file, or importing
and exporting the user configuration file, all of which are required by independent claim 1.

Nierlich does not cure the deficiencies of Potega. For example, Nierlich is understood to
describe a set of instructions received from a management device that can include defining
callback intervals, actuating alarms, and controlling voltage channels (see col. 6, line 60, to col.
7, line 15, as noted in the Office Action). Nierlich does not, however, describe anything relating
to a user configuration file, much less a user configuration file accessible by a remote user
system for affecting a plurality of power-control ports, storage of the user configuration file, or
importing and exporting the user configuration file, all of which are required by independent
claim 1.

Karanam does not cure the deficiencies of Nierlich and Potega. For example, FIG. 3 of
Karanam and the corresponding discussion at col. 5, lines 1-39 (as noted in the Office Action), is
understood to describe a system that includes a DDE server 100, logical data tables 102, and a
variety of connected modules 104, 106, 108, 110, and 112. Karanam is understood to go on to

describe, at col. 8, lines 11-23 (as noted in the Office Action), an off-line server configuration

utility that: provides for communication port, device/topic, and device type register map, group

polling priority, and supported function codes configuration, as well as device type register map

invalid register addresses, item mnemonic to register mapping, and server operational

parameters; and also allows for the exporting and importing of register groups and mnemonics.

Karanam is also understood to describe, at col. 17, lines 33-49 (as noted in the Office Action), a

feature that allows a user to configure the system as well as export and import register groups

and mnemonics. Karanam does not, however, describe anything relating to a user configuration

file accessible by a remote user system for affecting a plurality of power-control ports, much less

storage of the user configuration file or importing and exporting the user configuration file, all of

which are required by independent claim 1.

Furthermore, Applicants respectfully submit that there is no suggestion or motivation to

combine the references.

Therefore, Potega, Nierlich, and Karanam, individually or in combination, do not teach or

suggest the requirements of independent claim 1. Accordingly, Applicants respectfully request

that the 35 U.S.C. § 103(a) rejection be withdrawn from independent claim 1.

Claim 13

Independent claim 13 requires "a user configuration file transfer application providing for

selectably importing a user configuration file from the distal power manager application through

the data communications port system to the power manager memory, or exporting the user

configuration file from the power manager memory through the data communications network

port system to the distal power manager application over the data communications network"

(emphasis added).

Potega does not teach or suggest a user configuration file, much less selectably importing

a user configuration file or exporting the user configuration file, as required by independent

claim 13. For example, Potega is understood to describe a remote Master Control Unit (MCU)

that sends commands to controllable power supplies (see col. 30, line 63, to col. 31, line 8, as

noted in the Office Action). Potega does not, however, describe anything relating to a user

configuration file, much less selectably importing a user configuration file or exporting a user

configuration file, both of which are required by independent claim 13.

Nierlich does not cure the deficiencies of Potega. For example, Nierlich is understood to describe a set of instructions received from a management device that can include defining callback intervals, actuating alarms, and controlling voltage channels (see col. 6, line 60, to col. 7, line 15, as noted in the Office Action). Nierlich does not, however, describe anything relating to a user configuration file, much less selectably importing a user configuration file or exporting the user configuration file, both of which are required by independent claim 13.

Karanam does not cure the deficiencies of Nierlich and Potega. For example, FIG. 3 of Karanam and the corresponding discussion at col. 5, lines 1-41 (as noted in the Office Action), is understood to describe a system that includes a DDE server 100, logical data tables 102, and a variety of connected modules 104, 106, 108, 110, and 112. Karanam is understood to go on to describe, at col. 8, lines 11-23 (as noted in the Office Action), an off-line server configuration utility that: provides for communication port, device/topic, and device type register map, group polling priority, and supported function codes configuration, as well as device type register map invalid register addresses, item mnemonic to register mapping, and server operational parameters; and also allows for the exporting and importing of register groups and mnemonics. Karanam is also understood to describe, at col. 17, lines 33-49 (as noted in the Office Action), a feature that allows a user to configure the system as well as export and import register groups and mnemonics. Karanam does not, however, describe anything relating to a user configuration file, much less selectably importing a user configuration file or exporting the user configuration file, both of which are required by independent claim 13.

Furthermore, Applicants respectfully submit that there is no suggestion or motivation to combine the references.

Therefore, Potega, Nierlich, and Karanam, individually or in combination, do not teach or suggest the requirements of independent claim 13. Accordingly, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection be withdrawn from independent claim 13.

Request for Interview

If any issues remain, the Examiner is formally requested to contact the undersigned attorney prior to issuance of the next Office action in order to arrange a telephonic interview.

This request is being submitted under MPEP § 713.01, which indicates that an interview may be arranged in advance by a written request.

Conclusion

Applicants respectfully submit that the claims in their present form should be allowed. Such action is respectfully requested.

Respectfully submitted,

KLARQUIST SPARKMAN, LLP

One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Telephone: (503) 595-5300   By___/s/Justin D. Wagner
Facsimile: (503) 595-5301   Registration No. 54,519